

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEEP OCEAN, LLC;  
FENGLING WANG,

Plaintiffs,

v.

KATHY BARAN, *et al.*,

Defendants.

CASE NO. 18-cv-00991-MJP  
ORDER HOLDING CASE IN  
ABEYANCE

**JOINT STIPULATION**

The parties submit the following stipulation and proposed order to agree and request that this case continued be stayed for thirty days to allow the reopening of Plaintiff's administrative case by U.S. Citizenship and Immigration Services ("USCIS") to be completed.

By notice dated October 19, 2018, USCIS reopened Plaintiff's administrative case concerning his 2018 Petition for Nonimmigrant Worker (Form I-129) requesting an extension of his L-1A visa. This provided Plaintiff with 30 days to provide additional information to USCIS in support of his petition. At the request of Plaintiff, and to allow for additional time for Plaintiff to provide information/documentation to USCIS in

1  
2 support of his petition, USCIS re-issued a notice on November 18, 2018. Plaintiff had  
3 until December 16, 2018 to make any submissions.

4 The parties seek a 30-day extension of the abeyance to allow time for USCIS to  
5 complete the review Plaintiff's administrative case with the addition of the new  
6 submissions by Plaintiff. There is good cause to grant this request as the administrative  
7 process may resolve all or some outstanding litigation issues presented in this matter.

8 The parties will file a joint status report with the Court no later than March 29,  
9 2019, indicating the status of the case and, if it has not been resolved, proposing the next  
10 steps of the case, including a new deadline for Defendants to respond to the Complaint  
11 and a briefing schedule.

12 DATED this 28th day of February, 2019.

13 Respectfully submitted,

14 BRIAN T. MORAN  
15 United States Attorney

16 /s/ Michelle R. Lambert  
17 MICHELLE R. LAMBERT, NYS #4666657  
18 Assistant United States Attorney  
19 United States Attorney's Office  
20 700 Stewart Street, Suite 5220  
21 Seattle, Washington 98101-1271  
22 Phone: 206-553-7970  
23 Email: [michelle.lambert@usdoj.gov](mailto:michelle.lambert@usdoj.gov)  
24 *Attorneys for Defendants*

25 GIBBS HOUSTON PAUW  
26 /s/ Robert Pauw  
27 ROBERT PAUW, WSBA #13613  
28 1000 Second Ave., Suite 1600  
Seattle, WA 98104  
Phone: 206-682-1080  
Email: [rpauw@ghp-law.net](mailto:rpauw@ghp-law.net)  
*Attorney for Plaintiff*

1  
2 **ORDER**

3 The Parties having so stipulated and agreed, it is hereby **SO ORDERED**. The  
4 case shall be held in abeyance and all deadlines shall be stayed for 30 days, including  
5 Defendants' deadline to respond to the Complaint. The parties shall submit a joint status  
6 report to the Court on or before March 29, 2019.  
7

8  
9 DATED this 4th day of March, 2019.  
10

11 

12 Marsha J. Pechman  
13 United States District Judge  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28